Hillfoot Steel Ltd conducts business in compliance with the applicable laws and in line with our company values. As a condition of doing business with us we expect our suppliers to act similarly and have created this document summarising our requirements:

1. Interaction and mutual respect

1.1 When interacting with us

Whether meeting us on site or calling/ video calling us:

We will treat all suppliers with respect and professionalism and expect the same in return.

Behaviour such as verbal abuse, harassment, threats, intimidation or violence towards any member of our staff will not be tolerated and may in some cases be reported as a criminal offence. This also applies to online abuse or harassment by use of text, email or social media.

1.2 Delivering to our site

In addition to paragraph 1.1, drivers of vehicles for loading /unloading must always wear appropriate PPE and adhere to all local laws and site signage to ensure everyone's safety.

1.3 When we are visiting you

We may request to visit your facilities on pre-agreed basis – paragraph 1.1 applies.

2. Human rights

The supplier must comply with all applicable human rights and employment laws in the jurisdictions in which they work. This includes complying with the provisions of the Modern Slavery Act 2015 & Right to Work.

3. Ethical business practices

The supplier must conduct their business with integrity, avoiding any form of dishonesty or fraudulent activity, including bribery and unfair competition.

4. Responsible sourcing

The supplier shall use conflict free materials and comply with the laws applicable to the end use of our products:

- Dodd-Frank Act Section 1502 ("conflict materials" : Ta, Sn, Au, W)
- Regulation 1907/2006/ UK REACH (Registration, Evaluation, Authorisation and Restriction of Chemical substances)

We may request additional declarations on an ad- hoc basis, including CMRT and/or EMRT for the products purchased by Hillfoot Steel Ltd.

5. Statutory and Regulatory requirements

The products and processes supplied by the supplier must comply with all applicable regulations which may apply to the country of production, receipt and shipment.

Additional laws may apply, when specified, which apply to the country of the final use of the application. This will be specifically communicated to the supplier at the time of the order placement.

6. Export Controls and Economic Sanctions

Noncompliance with export controls and economic sanctions is a criminal offence in many countries. The supplier must comply with UK, EU and USA sanctions and no material (or its processing) can take place in the following countries:

North Korea, Russia (as per Article 3g of Council Regulation (EU) 2023/1214), Belarus, Syria, occupied regions of Ukraine, Iran, Sudan and Cuba.

Whilst the above list is valid at the time of issuing of this policy, it is subject to change.

It is the suppliers' responsibility to ensure they comply with the most up to date sanction lists, valid at the time of the delivery of goods to Hillfoot Steel Ltd.

Due to our products being exported by us and our customers, the above origin restrictions apply to all domestic purchases as well as imported goods regardless of whether the material complied with the sanctions at the time of the delivery.

We may request additional evidence of the material's origin on a case by case basis as requested by our clients and/ or authorities.

7. Environmental responsibility

Due to the global impact of the metal industry on the environment we require our suppliers to adapt their processes and initiate improvements to reduce their impact on energy usage, minimise the waste and lessen the pollution of the environment.

Environmental Management System such as ISO14001 and Energy Management System ISO5001 are preferred.

We may request specific data relating to the emission generated by the products we buy on an ad- hoc basis.

8. Health and safety

The working environment at the supplier's facility must support safe working practices and accident prevention to ensure minimised exposure to health risks for its employees.

Health and Safety management system such as ISO45001 is preferred.

9. Data protection, security and intellectual property

Suppliers should respect valid intellectual property rights in the handling of competitive data.

Any documents shared with the supplier, in particular material specifications and drawings, remain the property of Hillfoot Steel Ltd and should not be viewed or shared by any unauthorised personnel or shared outside of the supplier's organisation without our prior approval.